

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

In re:

Petr Vach  
dba VP Fossils d/b/a CNG Interceptor and  
Heather Dawn Vach,  
Debtor(s).

---

Case No. 6:19-bk-00976-KSJ  
Chapter 7

**RESPONSE TO TRUSTEE'S  
MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS**

COMES NOW, Quicken Loans Inc., ("Creditor"), a secured creditor in connection with real property located at **910 Hawk Landing, Fruitland Park, FL 34731** and files this Response to Trustee's Motion to Sell Property Free and Clear of Liens (the "Motion") and in support thereof, states the following:

1. Creditor holds a first mortgage encumbering a real property located at **910 Hawk Landing, Fruitland Park, FL 34731** (the "Property") and more particularly described as:

LOT 37, WINGSPREAD, ACCORDING TO THE PLAT THEREOF AS RECORDED IN PLAT BOOK 38, PAGE(S) 64-67, PUBLIC RECORDS OF LAKE COUNTY, FLORIDA.

Commonly known as: 910 Hawk Lndg , Fruitland Park, FL 34731

2. On May 20, 2019 an Agreed Order Granting Motion for Relief from Stay by Quicken Loans Inc. was entered granting relief effective ninety (90) days from the date of entry.
3. On October 22, 2019, the Trustee filed a Motion to Sell Property Free and Clear of Liens (ECF No. 27).
4. Creditor does not object to the Sale of the property so long as the sale is subject to approval by the Creditor and Creditor is paid in full.

**WHEREFORE**, the undersigned respectfully requests that the Motion to Sell Real Property be granted subject to the Creditor's approval of said short sale and Creditor is paid in full.

Respectfully submitted,

Dated: November 6, 2019

/s/ Leslie Rushing  
Leslie Rushing, Esq.  
Florida Bar No. 98106  
Quintairos, Prieto, Wood & Boyer, P.A.  
1475 Centrepark Blvd., Suite 130  
West Palm Beach, FL 33401  
Telephone: (561) 686-1880 x 1311  
Fax: (561) 686-1886  
Primary Email:  
[leslie.rushing@qpwbllaw.com](mailto:leslie.rushing@qpwbllaw.com)  
Secondary Email:  
[flsdbknotices@qpwbllaw.com](mailto:flsdbknotices@qpwbllaw.com)

**CERTIFICATE OF SERVICE**

I certify that I have caused to be served a copy of the foregoing by first class mail, postage prepaid or by CM/ECF electronic filing upon the parties listed below on this day.

Dated: November 6, 2019

/s/ Leslie Rushing  
Leslie Rushing, Esq.  
Florida Bar No. 98106

Copies Furnished To:

By CM/ECF Receipt:

Andrea B Anderson, Esq.  
Bogin, Munns, Munns, P.A.  
Post Office Box 2807  
Orlando, FL 32802-2807  
Email: aanderson@boginmunns.com

Trustee  
Lori Patton  
Law Office of Lori Patton, PA  
PO Box 520547  
Longwood, FL 32752

U.S. Trustee  
United States Trustee - ORL7/13  
Office of the United States Trustee  
George C Young Federal Building  
400 West Washington Street, Suite 1100  
Orlando, FL 32801

By First Class Mail:

Petr Vach  
Heather Dawn Vach  
910 Hawk Landing  
Fruitland Park, FL 34731